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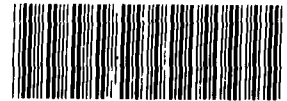
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EG&G ROCKY FLATS

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December 14, 1993

93-RF-15156

James K Hartman
Assistant Manager for Transition and Environmental Restoration
DOE, RFO

Attn David Joseffy

RESPONSE TO THE DEPARTMENT OF ENERGY (DOE) AUDIT 94-QA-L2-002
CONCERNING THE OPERABLE UNIT (OU) 2 SURFACE WATER ACTIVITIES -
NMH-648-93

Ref J K Hartman ltr (12946) to R L Benedetti and T G Hedahl, Evaluation of
Operable Unit 2, (OU 2) Surface Water Activities, November 19, 1993

Attached are the EG&G Rocky Flats, Inc (EG&G) responses to the above referenced
audit The two issues are addressed below

ISSUE 1

The analytical methods selected to characterize OU 2 surface water sampling
locations SW-59, 61, and 132 are not sensitive enough to characterize and identify
certain volatile organic compound (VOC) contamination levels consistent with OU 2
Interim Measure/Interim Remedial Action Plan (IM/IRAP) surface water
Applicable or Relevant and Appropriate Requirements (ARARs)

RESPONSE

The requirement for the OU-2 IM/IRAP program is that the treatment system
effluent meet ARARs The analytical methods chosen for the surface water treatment
unit effluent are sensitive enough to demonstrate compliance with ARARs This
requirement is consistently met

All the samples collected for the Treatability Study Report (TSR) were analyzed
using a analytical method sensitive enough to meet ARARs The treatment unit had an
influent characterization point (RS-1) The surface water samples were collected
and analyzed under a different program, the sitewide surface water monitoring
program Therefore, the surface water samples were not and did not need to be
analyzed with respect to ARARs These samples were used for the risk assessment
and characterization of the sources, not as part of the treatability report

DIST	LTR	ENC
BENEDETTI, R.L.		
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL, G.I.		
COPP, R.D.		
DAVIS, J.G.		
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KIRBY, W.A.		
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LEE, E.M.		
MANN, H.P.	X	X
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STEWART, D.L.		
SULLIVAN, M.T.		
SWANSON, F.R.		
WILKINSON, R.B.	X	X
WILLIAMS, S. (ORC)		
WILSON, J.M.		
ZANE, J.O.		
HUTCHINS	X	X
ROSE	X	X
BUSBY	X	X
LAURIA	X	X
MADEL	X	X
VESS	X	X
WETHEBE	X	X
BARRAS	X	X
ADMIN REC	X	X
ENV RECORDS CENTER (R)	X	X
CORRES CONTROL	X	X

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IN REPLY TO RFP CC NO
4989

ACTION ITEM STATUS

☐ OPEN ☒ CLOSED
☐ PARTIAL

LTR APPROVALS
ALP: [signature] WSB: [signature]
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ALP: [signature]

RF-46469 (Rev 4/92)

ADMIN RECORD

BZ-A-00000

J K Hartman
December 14, 1993
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ISSUE 2

The Environmental Protection Management Surface Water Sampling Site Description Book (SWSSDB) is not controlled

RESPONSE

The EP SWSSDB is the output derived from implementation of 5-21000 OPS-SW 12, Site Description. The EP SWSSDB document does not direct or control any field activities, it is a reference document only. While it would be easy to update this document if it were controlled, ERM disagrees that it should be put into the controlled document distribution system.

If you have any comments concerning this matter, please contact P J Laurin of my staff at extension 8702.



Ned M. Hutchins, Acting
Associate General Manager
Environmental Restoration Management
EG&G Rocky Flats, Inc

ALP jlm

Orig and 1 cc - J K Hartman

Attachment
As Stated

cc

E A Dillé	-	DOE, RFO
S R Grace	-	" "
A H Paoule	-	" "
R J Schassburger	-	" "
M N Silverman	-	" "

**RESPONSE TO THE DOE INFORMAL AUDIT 94-QA-L2-002
ENVIRONMENTAL RESTORATION/OPERABLE UNIT 2
(WALNUT CREEK) SURFACE WATER ACTIVITIES
OCTOBER 7-22, 1993**

OPERABLE UNIT 2 SURFACE WATER ISSUE

- I 1 The analytical methods selected to characterize Operable Unit (OU) 2 surface water sampling locations SW-59, 61, and 132 are not sensitive enough to characterize and identify certain VOC contamination levels consistent with OU 2 Interim Measure/Interim Remedial Action Plan (IM/IRAP) surface water Applicable or Relevant and Appropriate Requirements (ARARs)

RESPONSE

The requirement for the OU-2 IM/IRAP program is that the treatment system effluent meet ARARs. The analytical methods chosen for the surface water treatment unit effluent are sensitive enough to demonstrate compliance with ARARs. This requirement is consistently met.

All the samples collected for the Treatability Study Report (TSR) were analyzed using an analytical method sensitive enough to meet ARARs. The treatment unit had an influent characterization point (RS-1). The surface water samples at SW-59, 61, and 132 were collected and analyzed under a different program, the sitewide surface water monitoring program. Therefore, the surface water samples were not and did not need to be analyzed with respect to ARARs. These samples were used for the risk assessment and characterization of the sources, not as part of the treatability report.

SURFACE WATER PROGRAM ISSUE

- I 2 The Environmental Protection (EP) Management Surface Water Sampling Site Description Book (SWSSDB) is not controlled
- a. The SW-132 sample site description is inaccurate and depicts a site without the current concrete catchment basin
 - b. The document has not been formally reviewed, approved and distribution is not controlled
 - c. There is no review and approval by Environmental Restoration Management (ERM) for surface water sites that are included in OU investigations

RESPONSE

- a. The SW-132 location description will be updated. The surface water sample management and field crews have visited the site with OU 2 personnel to ensure that the correct sampling location is used.
- b. The EP SWSSDB is the output derived from implementation of 5-21000 OPS-SW 12, Site Description. This document does not direct or control any field activities, it is a reference document only. While it would be easy to update this document if it were controlled, ERM disagrees that it should be put into the controlled document distribution system.
- c. The latest, updated revision of the document will be reviewed and approved by the appropriate EP and ERM personnel including the Surface Water Program managers and OU managers.

ERM PROGRAMMATIC DEFICIENCIES

D 1 The ERM OU 2 documents were not adequately controlled

- a. The OU 2 Field Sampling Plan lacks controlled distribution and is not approved for release by the involved personnel.

RESPONSE

The first sentence of this deficiency, categorized as programmatic, is an overstatement. The audit finding is only in regard to the OU 2 Field Sampling Plan.

- a. Since the audit occurred, the OU 2 Field Sampling Plan has been released as a controlled document. It is currently being revised and will be re-issued as a controlled document.

D 2 There is inadequate design control and verification of Environmental Restoration OU 2 scientific investigations

- a. Lack of controlled drawings incorporated into IM/IRAP and Field Treatability Study documents,
- b. Lack of document review and verification of drawings incorporated into IM/IRAP and Field Treatability Study documents,
- c. Figure 1-3 of 21100-TR-OU02 03-2, Summary and Analysis of Results, Field Treatability Study, Phase II Operable Unit 2 has the effluent pipeline from the Field Treatability Unit in the wrong location, indicating that the effluent is discharged downstream of SW-132.

- d Some ARARs listed in the design basis tables, IM/IRAP Table 4-1, and the ARAR tables in Appendix E of the IM/IRAP are inconsistent
- e The SW-132 sample site description was not reviewed by ERM OU 2 personnel, possibly contributing to the sample site location error described in the Audit Results Summary, Background section

RESPONSE

There was inadequate design control and verification for the Surface Water IM/IRAP. This project was designed and constructed prior to the implementation of strict controls and procedures for environmental projects at RFP. However, all current OU 2 investigations are conducted with strict design control and verification.

- a As noted above. The Field Treatability Study Report summarizes treatability data and is not a design or implementation document, therefore, it does not require controlled drawings.
- b As noted above. However, as the Field Treatability Study Report summarizes treatability data and is not a design or implementation document, it does not require controlled drawings.
- c The Draft Field Treatability Study Report was reviewed for this audit. This report is now being finalized and this drawing will be corrected.
- d The correct ARARs are listed in the Field Treatability Study Report.
- e As noted in the response for Issue 2, ERM and EP personnel are working together to verify sampling locations.

OU-2 SPECIFIC DEFICIENCIES

- D.3 A readiness review was not performed prior to OU 2 Phase I or II activities.

RESPONSE

While no readiness reviews were performed in the past for the Surface Water IM/IRAP, readiness reviews are being performed for all current field projects.

- D.4 Analytical methods specified for VOCs in the Sampling and Analysis Plan for the OU 2 Field Treatability Unit (FTU) have not been revised to reflect the methods currently in use.

RESPONSE

The Field Sampling Plan is being revised to reflect the analytical methods currently in use

OBSERVATIONS

- O 1 Several places in Appendix E, Tables E-1 1 and E-1 2 of the IM/IRAP contain in the comments section, "Standard is below detection limit, therefore, detection limit is ARAR." This comment and its corresponding ARAR do not reference the analytical method used to establish the stated ARAR. This omission may have been a contributing factor to the concern raised in Issue 1 1

RESPONSE

The analytical method has been changed to a method that is sensitive enough to evaluate the surface water with respect to ARARs. All detection limits are now below ARARs

- O 2 There are unclear and conflicting objectives for the OU 2 Phase II IM/IRAP Treatability Study. This condition may have been significantly driven by the regulators, however, some concerns are listed below
- a The project was both a remedial effort and a treatability study. This made it difficult to list objectives which can achieve closure. An example of an achievable objective is "The OU 2 treatment unit performance will be assessed after treatment of 2,000,000 gallons of influent."
 - b Objectives to minimize the production of by-product Low-Level Mixed Waste conflict with indefinite base flow treatment of the three sources

RESPONSE

The objectives of the IM/IRAP, while not explicitly clear, are not conflicting. They all pertain to implementation and operation of the FTU and completion of a TSR.

- a. Noted
 - b Noted, however continued remediation operations will generate Low Level Mixed Waste as a by-product
- O 3 Operable Unit 2 ARAR levels are more stringent than OU-1 and other Colorado CERCLA site ARARs

RESPONSE

EG&G is aware of the DOE efforts to resolve this issue. However, until the time that all parties involved agree to uniform ARARs, EG&G will continue to operate under the current ARARs.

South Walnut Creek discharges into the B series ponds. All water from these ponds are monitored and sampled prior to release to ensure compliance with the stringent water quality standards.

- 4 There is no documented evidence that waters sampled within the culvert catchment basin located at SW-132 are hydrologically distinct from adjacent OU 2 treated effluent waters.

RESPONSE

Visual inspection indicates that the waters sampled at SW-132 are hydrologically distinct from adjacent surface waters, and there is no evidence that the waters sampled at SW-132 are hydrologically connected with the adjacent surface waters. Water levels within the catchment basin do not fluctuate with discharge levels. The effluent waters are generally located lower than the culvert catchment basin. Additionally, if water was leaking into the pipe, the samples from the catchment basin would still be representative of the water that is collected and treated.